

Message

From: Allen, Elizabeth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5E7BDB078EA544C3939CE6E375FDE197-ALLEN, ELIZABETH]
Sent: 12/9/2019 7:49:03 PM
To: Mednick, Richard [Mednick.Richard@epa.gov]; Cora, Lori [Cora.Lori@epa.gov]
Subject: RE: Oregon Risk Rules
Attachments: Pages from Portland Harbor_FS_Tables.pdf

Lori is better able to speak to what was determined in the ROD, but we treated what you cite as an ARAR in the FS. I

Ex. 5 Deliberative Process (DP)

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From: Mednick, Richard <Mednick.Richard@epa.gov>
Sent: Monday, December 9, 2019 11:36 AM
To: Cora, Lori <Cora.Lori@epa.gov>; Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: Oregon Risk Rules

Lori and Elizabeth,

For the Bradford Island Site (which may be proposed for the NPL), the Army Corps of Engineers believes that Oregon risk assessment rules (OAR 340-122-0084 & 340-122-0115) would not be ARARs because the rules do not contain cleanup standards and do not address a particular contaminant, action or location. Those rules prescribe an acceptable risk level of 1×10^{-6} for individual carcinogens and 1×10^{-5} for multiple carcinogens. The Oregon rules look pretty similar to MTCA which I think we have always treated as ARARs for Washington sites. Do you know whether we have considered these Oregon rules ARARs for Oregon sites?

Thank you,

Richard

Richard Mednick
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